

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GEORGE J. FERGUSON)	
)	
Plaintiff,)	
)	
v.)	No. 2013 CV 4084
)	JUDGE ELLIS
CITY OF CHICAGO, a municipal corporation)	
)	
Defendant)	

REQUEST FOR ENTRY OF RULE 58 JUDGMENT

PURSUANT to Rule 58(d), F.R.Civ.P., plaintiff respectfully requests that judgment be entered in his favor and against the City of Chicago in the sum of \$300,000.00. In support hereof, plaintiff states:

1. The jury returned a special verdict for plaintiff's non-economic and intangible losses in the sum of \$863,000.00 on June 24, 2014, following charges by the court. Plaintiff will be timely filing motions for equitable relief, unaffected by the amount of the verdict, and a bill of costs.
2. Rule 58(a), FRCivP, requires that every judgment be entered on a separate document; Rule 58(d) permits a party to request such entry.
3. Title 42 U.S.C. 1981a(b)(3)(D) imposes limitations on the sum an aggrieved employee under Title VII and the Americans with Disabilities Act may be awarded for emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life and other non-pecuniary losses to \$300,000.00, when such employee is employed by an employer with 501 or more employees. The City of Chicago has 501 or more employees.
4. The judgment entered for such non-economic losses, therefore is limited to \$300,000.00.

WHEREFORE, plaintiff respectfully requests the court to enter a Rule 58 judgment in the sum of \$300,000.00 for the legal relief afforded by 42 U.S.C. 1981a(b)(3)(D).

/s/Ernest T. Rossiello
ERNEST T. ROSSIELLO

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Dated: June 29, 2016
Chicago, Illinois

Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned, an attorney, states that a true and correct copy of said document was served upon defendants pursuant to ECF as to Filing Users in accordance with Fed.R.Civ.P.5(a) and (b) on June 29, 2016.

/s/ Ernest T. Rossiello
ERNEST T. ROSSIELLO